

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Case No: 1:21-CV-00714

Arthur Hill,)
)
Plaintiff *pro se*,)
)
v.)
)
Carvana, LLC and)
Experian Information Solutions, Inc.)
)
Defendants.)

**PLAINTIFF'S SECOND SET OF INTERROGATORIES AND
REQUEST FOR PRODUCTION TO CARVANA, LLC**

Plaintiff Arthur Hill, pursuant to Rules 26, 33 and 34 of the Federal Rules of Civil Procedure, hereby requests that the Carvana, LLC answer under oath the following interrogatories and request for production within 30 days of receipt.

The following definitions apply to the discovery requests:

DEFINITIONS

- 1) Whenever the term “you”, “your”, “yourself”, “Carvana” is used herein, it refers to the Defendant, Carvana, LLC.
- 2) Whenever the term “my”, “me”, “I”, “Hill” or “Plaintiff” is used herein, it refers to the Plaintiff, Arthur Hill.
- 3) Whenever the term “FCRA” is used herein, it refers to the Fair Credit Reporting Act or 15 U.S.C. § 1681 et seq.
- 4) Whenever the terms “user”, “credit report”, “credit file disclosure” or “consumer” is

used herein, it refers to the definitions of those terms in the FCRA under 15 U.S.C. § 1681a.

- 5) Whenever “**Get My Finance Terms**” is used herein, it means the process found at www.carvana.com which is used during the process of purchasing a vehicle online. This is usually done by finding a vehicle online and clicking on the “Get Started” button or link in the upper right-hand corner of the webpage.
- 6) Whenever the term “**Experian**” is used herein, it means Experian Information Solutions, Inc.
- 7) Whenever the term “**document**” or “**documents**” is used herein, it means any document in the broadest sense of the word and includes but is not limited to any ESI, communications, emails, files of any kind, databases, notes, facsimiles, memos and notes whether written or typed and publicly available information such as that found on the world wide web.

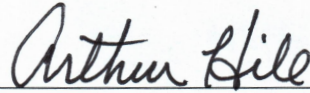
INTERROGATORIES

Plaintiff Arthur Hill, pursuant to Rule 33 of the Federal Rules of Civil Procedure, hereby requests that the Carvana, LLC answer under oath the following interrogatories.

1. Identify all facts and documents supporting your contention that “Carvana affirmatively alleges that the soft inquires of Plaintiff’s credit on April 7, 2020 and August 17, 2020 were triggered by multiple changes Plaintiff made to his Carvana account on both April 7, 2020 (changed yearly income, zip code, and address) and August 17, 2020 (changed yearly income and address) for account review and because Plaintiff also consented to the soft inquires by choosing the “Get My Financing Terms” option on April 7, 2020 and August 17, 2020, which also led to

Carvana doing a soft inquiry of Plaintiff's credit on April 7, 2020 and August 17, 2020, by consent of the Plaintiff." as alleged in paragraph 21 of your answer to the First Amended Complaint.

This the 21st day of April, 2022

A handwritten signature in cursive script that reads "Arthur Hill". The signature is written in dark ink and is positioned above a horizontal line.

Arthur Hill
2849 Trestle CT SW
Concord, NC 28025
980.521.1819
artbhill@hotmail.com

REQUEST FOR PRODUCTION

Plaintiff hereby requests that you produce and permit Plaintiff to copy and inspect each of the following documents at 2849 Trestle CT SW, Concord, North Carolina, 28025 within 30 days of receipt hereof. Any documents which are emails should be produced in their native form. Any documents other than email which are not media (voice or video) should be produced as searchable PDF unless stated otherwise. Any document that is sourced from DocuSign should be produced in its native form and include any digital signatures that are normally embedded by DocuSign Inc.

1. Produce all documents you referred to in answering each of the Plaintiff's Second Set of Interrogatories.

This the 21st day of April, 2022

A handwritten signature in black ink that reads "Arthur Hill". The signature is written in a cursive style and is positioned above a horizontal line.

Arthur Hill
2849 Trestle CT SW
Concord, NC 28025
980.521.1819
artbhill@hotmail.com

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
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Arthur Hill,)
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Plaintiff *pro se*,)
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v.)
)
Carvana, LLC)
)
Defendants.)

PLAINTIFF'S THIRD REQUEST FOR PRODUCTION TO CARVANA, LLC

Plaintiff Arthur Hill, pursuant to Rules 34 of the Federal Rules of Civil Procedure, hereby requests that the Carvana, LLC respond and produce documents as requested within 30 days of receipt.

The following definitions apply to the discovery requests:

DEFINITIONS

- 1) Whenever the term “**you**”, “**your**”, “**yourself**”, “**Carvana**” is used herein, it refers to the Defendant, Carvana, LLC.
- 2) Whenever the term “**my**”, “**me**”, “**I**”, “**Hill**” or “**Plaintiff**” is used herein, it refers to the Plaintiff, Arthur Hill.
- 3) Whenever the term “**FCRA**” is used herein, it refers to the Fair Credit Reporting Act or 15 U.S.C. § 1681 et seq.
- 4) Whenever the terms “**user**”, “**credit report**”, “**credit file disclosure**” or “**consumer**” is used herein, it refers to the definitions of those terms in the FCRA under 15 U.S.C. § 1681a.

- 5) Whenever the term “**Experian**” is used herein, it means Experian Information Solutions, Inc.
- 6) Whenever the term “**document**” or “**documents**” is used herein, it means any document in the broadest sense of the word and includes but is not limited to any ESI, communications, emails, files of any kind, databases, notes, facsimiles, memos and notes whether written or typed and publicly available information such as that found on the world wide web.

REQUEST FOR PRODUCTION

Plaintiff hereby requests that you produce and permit Plaintiff to copy and inspect each of the following documents at 2849 Trestle CT SW, Concord, North Carolina, 28025 or via email at artbhill@hotmail.com within 30 days of receipt hereof.

1. For each instance in which you inquired into the Plaintiff’s credit with Experian for any purpose on April 7, 2020, produce a copy of any document, credit report or other information you received from Experian in its native form, including but not limited to XML, JSON and PDF. Alternatively, if you received and converted information from Experian into a form that is more easily used, then produce in that form.

RESPONSE 1:

2. For each instance in which you inquired into the Plaintiff’s credit with Experian for any purpose on August 17, 2020, produce a copy of any document, credit report or other information you received from Experian in its native form, including but not limited to XML, JSON and PDF. Alternatively, if you received and converted information from Experian into a form that is more easily used, then produce in that form.

RESPONSE 2:

3. Produce a copy of every email OR other document you sent to the Plaintiff on April 7 and August 17 of 2020.

RESPONSE 3:

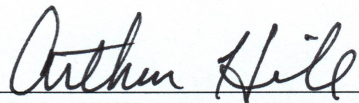
4. Produce a copy of all data collected by Google Analytics for any visits the Plaintiff made to carvana.com on August 15, 2019, April 7, 2020 and August 17, 2020.

RESPONSE 4:

5. Produce a copy of any document or developer resource provided by or available from Experian which you used to develop, create or modify the processes or code which were used to request information about the Plaintiff from Experian regarding Request for Production 1,2 & 3.

RESPONSE 5:

This the 9th day of May, 2022



Arthur Hill
2849 Trestle CT SW
Concord, NC 28025
980.521.1819
artbhill@hotmail.com

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FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Case No: 1:21-CV-00714

Arthur Hill,)
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Plaintiff *pro se*,)
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v.)
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Carvana, LLC)
)
Defendants.)

PLAINTIFF'S SECOND REQUEST FOR ADMISSIONS TO CARVANA, LLC

Plaintiff, pursuant to Rule 36 of the Federal Rules of Civil Procedure, serves upon the Defendant, Carvana LLC, the following requests for admissions, which must be answered by the Defendant separately and fully in writing, within thirty days after service. Responses to these requests may be emailed to the Plaintiff at artbhill@hotmail.com or mailed to his address at 2849 Trestle CT SW, Concord, NC 28025.

REQUESTS FOR ADMISSIONS

Request to Admit No. 1: Admit that on August 17, 2020, you did not send any document or communication to the Plaintiff regarding any (1) change of his address, (2) change of his yearly income, (3) change of his zip code, (4) financing terms or (5) anything regarding a vehicle hold being released.

Response:

REQUESTS REGARDING DOCUMENT AUTHENTICATION ONLY

Request to Admit No. 2: Admit that the document attached as Exhibit A is a true copy of an email you sent to the Plaintiff on Monday, August 9, 2021 at approximately 5:46 PM EST.

Response:

Request to Admit No. 3: Admit that the document attached as Exhibit B is a true copy of an email you sent to the Plaintiff on Saturday, August 17, 2019 at approximately 3:39 AM EST.

Response:

Request to Admit No. 4: Admit that the document attached as Exhibit B-1 is a true copy of a document you made available to the Plaintiff for download via a hyperlink in Exhibit B.

Response:

Request to Admit No. 5: Admit that the document attached as Exhibit C is a true copy of an email you sent to the Plaintiff on Monday, August 19, 2019 at approximately 4:38 AM EST.

Response:

Request to Admit No. 6: Admit that the document attached as Exhibit C-1 is a true copy of a document you made available to the Plaintiff for download via a hyperlink in Exhibit C.

Response:

Request to Admit No. 7: Admit that the document attached as Exhibit D is a true copy of an email you sent to the Plaintiff on Monday, August 17, 2020 at approximately 7:39 AM EST.

Response:

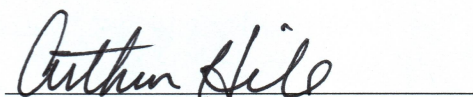
Request to Admit No. 8: Admit that the document attached as Exhibit E is a true copy of an email you sent to the Plaintiff on Monday, August 17, 2020 at approximately 8:01 AM EST.

Response:

Request to Admit No. 9: Admit that the document attached as Exhibit F is a true copy of an email you sent to the Plaintiff on Monday, August 9, 2021 at approximately 5:35 PM EST.

Response:

This 10th day of May, 2022.

A handwritten signature in cursive script, appearing to read "Arthur Hill", is written over a horizontal line.

Arthur hill
2849 Trestle Ct SW
Concord, NC 28025
Phone: 980-521-1819
Email: artbhill@hotmail.com